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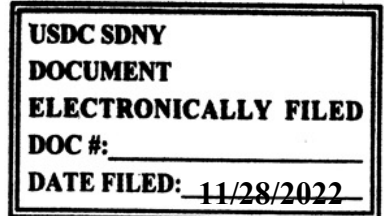
**MEMO ENDORSED**



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November 23, 2022

Via CM/ECF

**Hon. Katharine H. Parker**  
U.S. District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Ayassi v. Newman, et al.  
Case No. 1:22-cv-07139-LAK-KHP  
R&H File No. 805414

**APPLICATION GRANTED:** The Initial Case Management Conference scheduled for Monday, November 28, 2022 at 10:00 a.m. in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to **Thursday, February 9, 2023 at 11:45 a.m.**

**The Defendants are directed to serve a copy of this endorsement on the Plaintiffs.**

**APPLICATION GRANTED**

*Katharine H. Parker*

**Hon. Katharine H. Parker, U.S.M.J.**

11/28/2022

Dear Magistrate Judge Parker:

By way of introduction, we represent the defendants in the above referenced action. By Initial Case Management Conference Order dated August 24, 2022, an Initial Case Management Conference was scheduled for Monday, November 28, 2022, at 10:00 a.m. The Order directed that the defendants serve a copy of the Order and a copy of the Notice of Removal on the plaintiff.

While a copy of the Notice of Removal was served on plaintiff's counsel on August 22, 2022 – the date it was filed with this Court – we did not timely serve a copy of the Order due to a clerical error. As such, plaintiff's counsel was first made aware of the Order and the scheduling of the Initial Case Management Conference yesterday. The parties have not conferred for a Rule 26(f)/Rule 16(b) conference, served Rule 26(a) initial disclosures, nor filed a Report of Rule 26(f) Meeting and Proposed Case Management plan as required by the Order.

We apologize to the Court for our lapse and for any delay resulting therefrom. We have consulted plaintiff's counsel and, given the situation, we, jointly on behalf of all parties, respectfully request a one (1) month adjournment of the Initial Case Management Conference, and associated deadlines, so that the parties may comply with the Initial Case Management Conference Order.

The parties would also like to take the time offered by an adjournment to begin exploring early settlement of this action.


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We thank the Court for its time and courteousness in this matter. Should there be any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

Rawle & Henderson LLP

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ADL:BK

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